

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DZHOKHAR A. TSARNAEV,  
Defendant

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Crim. No.13-10200-GAO

**MOTION FOR LEAVE TO FILE GOVERNMENT'S MEMORANDUM REGARDING EX  
PARTE DOCUMENTS EX PARTE AND UNDER SEAL**

The United States of America, by and through its undersigned counsel, respectfully requests leave to file the memorandum referenced in the Government's Opposition to Defendant's Sealed Motion to Disclose Ex Parte Filings and Proceedings ex parte and under seal. As grounds for this motion, the government states that as described in further detail in the memorandum, the memorandum contains investigative and national security related information which has previously been handled ex parte by the court, identifies some of the reasons why these materials were submitted ex parte, and explains that the reasons for keeping them ex parte have not changed.

Respectfully submitted,

WILLIAM D. WEINREB  
Acting United States Attorney

By: /s/ Alope Chakravarty  
ALOKE S. CHAKRAVARTY  
Assistant U.S. Attorney

Date: March 6, 2017